

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: LOCAL TV ADVERTISING
ANTITRUST LITIGATION**

Master Docket No. 18 C 06785

MDL No. 2867

Honorable Virginia M. Kendall

**DECLARATION OF GINA M. INTREPIDO-BOWDEN IN SUPPORT OF PLAINTIFFS’
MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH DEFENDANTS CBS,
FOX, THE COX ENTITIES, AND SHAREBUILDERS**

I, Gina M. Intrepido-Bowden hereby declare and state as follows:

1. I am a Vice President at JND Legal Administration LLC (“JND”). I am a judicially recognized legal notice expert with more than 20 years of legal experience designing and implementing class action legal notice programs. I have been involved in many of the largest and most complex class action notice programs, including all aspects of notice dissemination.

2. JND is serving as the Settlement Administrator in the above-captioned litigation for the purposes of administering the Settlement Agreements, filed May 26, 2023 ([ECF No. 982-1](#)), preliminarily approved by the Court in its *Order Appointing the Settlement Administrator, Approving Settlement Notice Program, and Compelling Production of Customer Contact Information*, filed June 15, 2023 (“Preliminary Approval Order,” [ECF No. 994](#)).

3. I previously submitted a *Declaration on Proposed Settlement Notice Program*, dated June 9, 2023 ([ECF No. 988-1](#)); a *Declaration in Response to Defendants’ Sealed Motion to Reconsider, Vacate, and/or Stay Orders Regarding Preliminary Approval of Settlements and Notice*, dated July 5, 2023 ([ECF No. 1006-1](#)); and a *Supplemental Declaration of Gina M.*

Intrepido-Bowden, dated August 31, 2023 (“Intrepido-Bowden Supplemental Declaration,” [ECF No. 1059-1](#)) .

4. In its *Order Granting Plaintiffs’ Unopposed Motion for Extension of Time for Settlement Notice Program* dated August 9, 2023 ([ECF No. 1036](#)), this Court approved the amended Long Form, Email, and Postcard Notices and provided the Notice Program and court deadlines. In its *Amended Order Granting Preliminary Approval of Settlements with Defendants CBS, Fox, The Cox Entities, and ShareBuilders* dated August 9, 2023 ([ECF No. 1037](#)), this Court amended paragraph 7 of the Preliminary Approval Order. In its *Order Granting Plaintiffs’ Expedited Request for Modifications to Approved Class Notice Program* dated September 8, 2023 ([ECF No. 1067](#)), this Court approved the minor modification to the Settlement Notice Program as outlined in the Intrepido-Bowden Supplemental Declaration.

5. I submit this Declaration to inform the Court on the implementation of the approved Settlement Notice Program with modification.

NOTICE LIST COMPILATION

6. As described below, JND combined, analyzed, de-duplicated, and standardized the data that it received from the Defendants.

7. On July 7, 2023, Defendant TEGNA, Inc. (“TEGNA”) provided JND with an electronic file containing—where available—the names, mailing addresses, and email addresses of customers from 2013-2020. On July 12, 2023, Defendant Meredith Corporation (“Meredith”) provided JND with an electronic file containing—where available—the names, mailing addresses, and email addresses of customers from 2013-2020. On July 13, 2023, Defendant Raycom Media, Inc (“Raycom”) provided JND with an electronic file containing—where available—the names, mailing addresses, and email addresses of customers from 2013-2020. As none of these files was limited to the class list period of 2014-2018, JND worked to limit the list of customers to this time

period. JND then merged the Settlement Class Members with the customer information as provided by TEGNA, Meredith, and Raycom.

8. The Settlement Class List includes purchasers of broadcast television spot advertising directly from one or more Defendants in a designated market area within which two or more of the Defendants sold broadcast television spot advertisements on broadcast television stations and who paid one or more Defendants directly for all or a portion of the cost of such broadcast television spot advertisements from January 1, 2014 to and including December 31, 2018.¹

9. The Settlement Class Member data in the Settlement Class List identified above was promptly loaded into an electronic database established for this Action.

DIRECT NOTICE

10. On August 27, 2023, JND sent the Email Notice to 25,711 unique Settlement Class Member email addresses. A representative copy of the Email Notice is attached as **Exhibit A**. The Email Notice clearly and concisely explains in plain English the nature of the action and the terms of the Settlements. It also provides a clear description of who is a member of the Settlement Classes and the binding effects of Settlement Class membership and explains how to exclude oneself from the Settlement Classes, how to object to the Settlements, and how to contact Settlement Class Counsel.

11. As of October 4, 2023, of the 25,711 unique Settlement Class Member email addresses sent an Email Notice, 22,028 or 85.7% were deemed delivered and 3,683 or 14.3% were deemed undeliverable.

¹ Defendants include CBS, Cox Media Group LLC, Dreamcatcher Broadcasting, LLC, FOX, Griffin Communications, LLC, Meredith Corporation, Nexstar Media Group, Inc., Raycom Media, Inc, The E.W. Scripps Company, Sinclair Broadcast Group, Inc., TEGNA, Inc., and Tribune Broadcasting Company, LLC, and Tribune Media Company.

12. On August 27, 2023, JND mailed the Postcard Notice to 88,863 unique Settlement Class Member postal addresses. A representative copy of the Postcard Notice is attached as **Exhibit B**.

13. As of October 4, 2023, 477 Postcard Notices were forwarded by the United States Postal Service (“USPS”) to updated addresses and 14,007 Postcard Notices were returned as undeliverable by USPS. Of the 14,007 undeliverable Postcard Notices, 13 Postcard Notices were returned with updated addresses provided by USPS and were subsequently remailed. For the remaining undeliverable Postcard Notices, JND conducted advanced address searches and received updated address information for 6,055 records. JND promptly remailed 6,055 Postcard Notices to these records. Of the 6,055 Postcard Notices mailed to new addresses, 1,510 were undeliverable.

14. As of October 4, 2023, of the 88,863 unique Settlement Class Member postal addresses sent a Postcard Notice, 79,414 or 89.4% were deemed delivered and 9,449 or 10.6% were deemed undeliverable.

SUPPLEMENTAL MEDIA NOTICE

15. To supplement the direct notice effort, JND implemented a 4-week industry targeted media campaign, including digital and print media.

16. Digital ads ran from August 25, 2023 through September 21, 2023 on the top professional social platform (LinkedIn), key industry websites (*e.g.*, AdAge.com, AdWeek.com, MarketingWeek.com, MediaPost.com, TVNewsCheck.com), the leading digital network (GDN), and a digital trade desk (OMtd). A total of 26,722,176 digital impressions and 8,973 LinkedIn sponsored in-mail sends were delivered, 1,572,176 more impressions and 4,973 more sends than planned.

17. The LinkedIn effort targeted individuals in media buying groups, interested in marketing and advertising, at companies in the advertising service or marketing service industries, or at companies with less than 1,000 employees; and individuals whose current or past job title included Marketing/Advertising Consultant, Marketing/Advertising Manager, Director of Marketing/Advertising, Marketing/Advertising Coordinator, Agency Owner, Agency Director, Agency Manager, Advertising Agency, Head of Marketing, Marketing Manager, Broadcast Buyer, Senior Media Buyer, Media Buyer, Assistant Media Buyer, Advertising Media Buyer, Marketing Strategist, Senior Strategist, Strategist, Marketing Director, Marketing Specialist, Marketing Executive, Vice President Marketing, Marketing Coordinator, Director, Junior Media Buyer, Media Supervisor, Media Planner, Account Director, Senior Account Director; OR who have media buying or media planning skills. The GDN effort targeted individuals who browse industry websites such as MediaPost.com, AdAge.com, AdWeek.com, TVNewsCheck.com, MarketingWeek.com, and eMarketer.com. The trade desk activity targeted a marketing and advertising custom audience.

18. The digital activity was served across all devices (desktop, laptop, tablet, and mobile), with a heavy emphasis on mobile devices. The digital ads linked directly to the Settlement Website (<https://www.TVAdsSettlement.com>) where Settlement Class Members could learn more about the Settlement.

19. Screenshots of the digital notices as they appeared on LinkedIn and as banners on GDN, key industry websites, and through the programmatic provider, are attached as **Exhibit C**.

20. As planned, the publication notice appeared in the September print version of *AdWeek*, which was circulated to approximately 72,000 subscribers.

21. A copy of the print notice as is it appeared in *AdWeek* is attached as **Exhibit D**.

SETTLEMENT WEBSITE

22. On August 23, 2023, JND established and has been maintaining an informational and interactive, case-specific Settlement Website (<https://www.TVAdsSettlement.com>), that allows Settlement Class Members to learn more about the Settlement. The “Home” page provides a summary of the proposed Settlement, an overview of legal rights and options, and key dates. An “Important Documents” page provides, in PDF format, copies of the Notice, Claim Form, the list of the Designated Market Areas, Settlement Agreements for CBS, the Cox Entities, Fox, and ShareBuilders, Plaintiffs’ filed motions, and Court Orders, among other things. The “Frequently Asked Questions” section provides answers to questions about the Settlements, and the “Contact Us” page details how JND can be reached by email, toll-free telephone, and mail. The Settlement Website also allows the capability for Settlement Class Members to file an electronic claim.

23. The Long Form Notice and Claim Form are attached as **Exhibits E and F**, respectively. The Long Form Notice clearly and concisely explains in plain English the nature of the action and the terms of the Settlements. It also provides a clear description of who is a member of the Settlement Classes and the binding effects of Settlement Class membership and explains how to exclude oneself from the Settlement Classes, how to object to the Settlements, and how to contact Settlement Class Counsel.

24. As of October 4, 2023, there were a total of 34,163 page views of the Settlement Website pages and documents and 14,664 unique visitors to the Settlement Website. JND will continue to maintain the Settlement Website throughout the Settlement administration process.

TOLL-FREE NUMBER, EMAIL ADDRESS, AND P.O. BOX

25. On August 23, 2023, JND established and has been maintaining a Settlement-specific toll-free number, 1-844-717-0648, for Settlement Class Members to call for additional

information. During business hours, the call center is staffed with operators who are trained to answer questions about the Settlement using the approved answers to the FAQs referenced above.

26. As of October 4, 2023, JND has received 303 calls to the toll-free number from Settlement Class Members or other individuals. JND will continue to maintain the toll-free number throughout the administration process.

27. JND also maintains an email address, info@TVAdsSettlement.com (“Settlement Email Address”), that allows Settlement Class Members and other individuals to submit e-mail inquiries to JND. Emails are monitored by JND personnel who are trained to answer questions about the Settlement using the approved answers to the FAQs referenced above.

28. As of October 4, 2023, JND has handled 128 email communications received to the Settlement Email Address. JND will continue to maintain the Settlement Email Address throughout the settlement administration process.

29. On June 21, 2023, JND also established and has been maintaining a post office box (PO Box 91068, Seattle WA 98111) for this matter to receive Settlement Class Member correspondence, paper Claim Forms, and exclusion requests.

OBJECTIONS AND REQUESTS FOR EXCLUSION

30. The notice documents inform recipients that any Settlement Class Member who wants to object or exclude themselves from the proposed Settlement can do so by October 26, 2023. As of October 4, 2023, JND has received 0 objections and 1 request for exclusion.

31. The sole request for exclusion to date was reviewed and processed by JND. This process included determining the timeliness and validity of the request for exclusion and identifying the entity that fell within the scope of valid request for exclusion.

CLAIMS

32. The notice documents informed recipients that any Settlement Class Member who wants to file a claim in the proposed Settlement must do so by October 26, 2023. As of October 4, 2023, JND has received 2,486 claims.

CLAIMS STIMULATION EFFORT

33. JND is working with Class Counsel to deliver Reminder Notices via mail and multiple rounds of email to Settlement Class Members who have yet to file a claim or request exclusion from the Settlement. This reminder effort will continue up to the October 26, 2023 claims deadline. A representative copy of the Reminder Email and Reminder Postcard are attached as **Exhibits G and H**, respectively.

CONCLUSION

34. In my opinion, the proposed Settlement Notice Program is providing the best notice practicable under the circumstances of this Settlement and is consistent with the requirements of Rule 23 and other similar court-approved best practicable notice programs. JND will continue to administer the Settlement through all phases of Settlement administration in compliance with the approved Settlement Notice Program.

35. JND has complied with this Court's notice orders of June 15, 2023 (ECF No. [991](#)) and September 8, 2023 (ECF No. [1067](#)).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Philadelphia, Pennsylvania, this 11th day of October 2023.



GINA M. INTREPIDO-BOWDEN

- EXHIBIT A -

From: info@TVAdsSettlement.com
To: [Class Member email address]
Subject: Local Television Settlements Totaling \$48M

Purchasers of broadcast television spot advertising who paid the TV Broadcaster(s) *directly* between January 1, 2014 and December 31, 2018 may qualify for a payment in multiple class action settlements totaling \$48 million

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

You are receiving this notice because records indicate you may qualify.

YOUR UNIQUE ID:	<<Unique_ID>>
PLEASE SAVE THIS NUMBER TO FILE A CLAIM	

Four proposed settlements have been reached in a class action lawsuit called *In re: Local TV Advertising Antitrust Litigation*, MDL No. 2867, Case No. 18-C-06785 (N.D. Ill.) (the “Settlements”). The Settlements are between One Source Heating, Cooling, Inc., Thoughtworx, Inc., Hunt Adkins, Inc., and Fish Furniture, on behalf of the proposed Settlement Classes (together, “Plaintiffs”) and each of the following parties, respectively, Cox Media Group, LLC, Cox Enterprises, Inc., CMG Media Corporation (f/k/a Terrier Media Buyer, Inc. and d/b/a Cox Media Group), and Cox Reps, Inc. (collectively, “the Cox Entities”); Fox Corporation (“FOX”); CBS Corporation k/n/a Paramount Global (“CBS”); and ShareBuilders, Inc. (“ShareBuilders”) (collectively, “Settling Defendants”). The proposed Settlements are with these four Settling Defendants only and do not dismiss the claims against other defendants (“non-Settling Defendants”). The non-Settling Defendants, who also deny all wrongdoing, remain in the case and Plaintiffs’ lawsuit will continue against them.

WHO IS AFFECTED?

You are a Settlement Class Member if you purchased Broadcast Television Spot Advertising *directly* from one or more Broadcaster Defendants in a designated market area (“DMA”) within which two or more of the Broadcaster Defendants sold broadcast television spot advertisements on broadcast television stations and you paid one or more Defendants *directly* for all or a portion of the cost of such broadcast television spot advertisements from January 1, 2014 to and including December 31, 2018 (the “Class Period”). Broadcast Television Spot Advertising is defined at www.TVAdsSettlement.com or by calling 1-844-717-0648. A list of the DMAs is available at www.TVAdsSettlement.com or by calling 1-844-717-0648. The Broadcaster Defendants are CBS, Cox Media Group LLC, Dreamcatcher Broadcasting, LLC, FOX, Griffin Communications, LLC, Meredith Corporation, Nexstar Media Group, Inc., Raycom Media, Inc, The E.W. Scripps Company, Sinclair Broadcast Group, Inc., TEGNA, Inc., and Tribune Broadcasting Company, LLC, and Tribune Media Company. Purchases made through Cox Reps (including Telerep and HRP) or Katz (including Continental, Millennium, and Eagle) from any of the Broadcaster Defendants also qualify for inclusion in the Settlement Classes. Records indicate you may be a Class Member.

WHAT'S THIS LAWSUIT ABOUT?

Plaintiffs claim that they were injured as a result of defendants' alleged participation in an unlawful conspiracy to fix, raise, maintain, or stabilize the price levels of broadcast television spot advertising and their alleged illegal sharing of information. Both the Settling Defendants and non-Settling Defendants deny these allegations and all alleged wrongdoing. The Court previously dismissed ShareBuilders from the lawsuit, but has not otherwise decided who is right or wrong. Instead, the Settling Defendants have agreed to the Settlements to avoid the risk, cost, and inconvenience of further litigation. For more information, visit www.TVAdsSettlement.com.

WHAT CAN YOU GET FROM THE SETTLEMENTS?

If the Settlements are approved by the Court, The Cox Entities will pay \$37,000,000, FOX will pay \$6,000,000, and CBS will pay \$5,000,000 (collectively \$48,000,000) for payments to Settlement Class Members who timely submit a valid claim, after deducting costs associated with Settlement administration and notice, taxes, attorneys' fees (not to exceed 33.33% of the Settlements), and reimbursement for certain litigation costs and expenses (not to exceed \$6,000,000). In addition, the Settling Defendants will provide the Plaintiffs with cooperation, which will be used to continue to prosecute this case against the remaining non-Settling Defendants. Settlement Class Members who timely submit a valid approved Claim Form will receive compensation on a *pro rata* basis, to the extent economically feasible. If the total final claim payment is equal to or less than \$5.00, no distribution will be made to that claimant, and the claimant will be notified that there will be no distribution given the de minimis value of the claim. Go to www.TVAdsSettlement.com to learn more.

HOW DO YOU GET A PAYMENT?

Go to www.TVAdsSettlement.com or click the link below to file or download a Claim Form. All Claim Forms must be either submitted online or postmarked by **October 26, 2023**.

FILE A CLAIM

WHAT ARE YOUR OPTIONS?

If you are a Settlement Class Member and you do nothing or file a Claim Form, you will be bound by the Court's judgments. If you want to exclude yourself ("Opt Out") from one or more of these Settlements, you must submit an Exclusion Request for that Settlement postmarked by **October 26, 2023**. If you Opt Out of a Settlement, you will not receive any of its benefits, but you will keep your right to sue that Settling Defendant for the claims in this case. Any Settlement Class Member who does not Opt Out of a Settlement may object to that Settlement by filing a written objection by **October 26, 2023**. For details on how to Opt Out or object, go to www.TVAdsSettlement.com.

The Court will hold a hearing on December 7, 2023 at 12:30 p.m. CT to consider whether to approve the Settlements and grant Settlement Class Counsel's request for attorneys' fees and reimburse certain costs and expenses. The Court appointed Hausfeld LLP to represent Settlement Class Members as Settlement Class Counsel. You or your attorney may ask to appear and speak at the hearing at your own expense, but you do not have to.

HOW DO I GET MORE INFORMATION?

Visit www.TVAdsSettlement.com; call toll-free 1-844-717-0648; email info@TVAdsSettlement.com; or write Local TV Advertising Settlement, c/o JND Legal Administration, PO Box 91068, Seattle WA 98111.

Questions? Visit www.TVAdsSettlement.com or Call 1-844-717-0648

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

- EXHIBIT B -

*A federal court authorized this Notice.
This is not a solicitation from a lawyer.*

Purchasers of broadcast television spot advertising who paid the TV Broadcaster(s) directly between January 1, 2014 and December 31, 2018 may qualify for a payment in multiple class action settlements totaling \$48 million

You are receiving this notice because records indicate you may qualify.

Questions?
Visit www.TVAdsSettlement.com or
Call 1-844-717-0648

Local TV Advertising Settlement
c/o JND Legal Administration
PO Box 91068
Seattle WA 98111

«Barcode»

Postal Service: Please do not mark barcode

«Full_Name»
«CF_CARE_OF_NAME»
«CF_ADDRESS_1»
«CF_ADDRESS_2»
«CF_CITY», «CF_STATE» «CF_ZIP»
«CF_COUNTRY»

Four proposed settlements have been reached in a class action lawsuit called *In re: Local TV Advertising Antitrust Litigation*, MDL No. 2867, Case No. 18-C-06785 (N.D. Ill.) (the "Settlements"). The Settlements are between One Source Heating, Cooling, Inc., Thoughtworx, Inc., Hunt Adkins, Inc., and Fish Furniture, on behalf of the proposed Settlement Classes (together, "Plaintiffs") and each of the following parties, respectively, Cox Media Group, LLC, Cox Enterprises, Inc., CMG Media Corporation (f/k/a Terrier Media Buyer, Inc. and d/b/a Cox Media Group), and Cox Reps, Inc. (collectively, "The Cox Entities"); Fox Corporation ("FOX"); CBS Corporation k/n/a Paramount Global ("CBS"); and ShareBuilders, Inc. ("ShareBuilders") (collectively, "Settling Defendants"). The proposed Settlements are with these four Settling Defendants only and do not dismiss the claims against other defendants ("non-Settling Defendants"). The non-Settling Defendants, who also deny all wrongdoing, remain in the case and Plaintiffs' lawsuit will continue against them. For a complete list of Broadcaster Defendants, visit www.TVAdsSettlement.com.

Who is affected? You are a Settlement Class Member if you purchased Broadcast Television Spot Advertising *directly* from one or more Broadcaster Defendants in a designated market area ("DMA") within which two or more of the Broadcaster Defendants sold broadcast television spot advertisements on broadcast television stations and you paid one or more Defendants *directly* for all or a portion of the cost of such broadcast television spot advertisements from January 1, 2014 to and including December 31, 2018 (the "Class Period"). Broadcast Television Spot Advertising is defined at www.TVAdsSettlement.com or by calling 1-844-717-0648. A list of the DMAs is available at www.TVAdsSettlement.com or by calling 1-844-717-0648. Records indicate you may be a Class Member.

What is this lawsuit about? Plaintiffs claim that they were injured as a result of defendants' alleged participation in an unlawful conspiracy to fix, raise, maintain, or stabilize the price levels of broadcast television spot advertising and their alleged illegal sharing of information. Both the Settling Defendants and non-Settling Defendants deny these allegations and all alleged wrongdoing. The Court previously dismissed ShareBuilders from the lawsuit, but has not otherwise decided who is right or wrong. Instead, the Settling Defendants have agreed to the Settlements to avoid the risk, cost, and inconvenience of further litigation. For more information, visit www.TVAdsSettlement.com.

What can you get from the Settlements? If the Settlements are approved by the Court, The Cox Entities will pay \$37,000,000, FOX will pay \$6,000,000, and CBS will pay \$5,000,000 (collectively \$48,000,000) for payments to Settlement Class Members who timely submit a valid claim, after deducting costs associated with Settlement administration and notice, taxes, attorneys' fees (not to exceed 33.33% of the Settlements), and reimbursement for certain litigation costs and expenses (not to exceed \$6,000,000).

In addition, the Settling Defendants will provide the Plaintiff with cooperation, which will be used to argue to prosecute this case against the remaining non-Settling Defendants. Settlement Class Members who timely submit a valid approved Claim Form will receive compensation on a *pro rata* basis, to the extent economically feasible. Go to www.TVAdsSettlement.com to learn more.

How do I get a payment? Go to www.TVAdsSettlement.com and file or download a Claim Form. All Claim Forms must be either submitted online or postmarked by **October 26, 2023**.

What are your options? If you are a Settlement Class Member and you do nothing or file a Claim Form, you will be bound by the Court's judgments. If you want to exclude yourself ("Opt Out") from one or more of these Settlements, you must submit an Exclusion Request for that Settlement postmarked by **October 26, 2023**. If you Opt Out of a Settlement, you will not receive any of its benefits, but you will keep your right to sue that Settling Defendant for the claims in this case. Any Settlement Class Member who does not Opt Out of a Settlement may object to that Settlement by filing a written objection by **October 26, 2023**. For details on how to Opt Out or object, go to www.TVAdsSettlement.com.

The Court will hold a hearing on December 7, 2023 at 12:30 p.m. CT to consider whether to approve the Settlements and grant Settlement Class Counsel's request for attorneys' fees and expenses. The Court appointed Hausfeld LLP to represent Settlement Class Members as Settlement Class Counsel. You or your attorney may ask to appear and speak at the hearing at your own expense, but you do not have to.

Questions? Visit www.TVAdsSettlement.com; call toll-free 1-844-717-0648; email info@TVAdsSettlement.com, or write Local TV Advertising Settlement, c/o JND Legal Administration, PO Box 91068, Seattle WA 98111.



YOUR UNIQUE ID:	<<Unique_ID>>
PLEASE SAVE THIS NUMBER TO FILE A CLAIM	

Carefully separate this Address Change Form at the perforation

Name: _____

Current Address: _____


PLACE STAMP HERE

Address Change Form

To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.

Local TV Advertising Settlement
c/o JND Legal Administration
PO Box 91068
Seattle WA 98111

- EXHIBIT C -



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Affects those who paid a TV broadcaster directly for TV spot advertising









Local TV Ad Settlements
www.TVAdSettlement.com

1

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Solimar, explore relevant opportunities with Cars.com

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Longhorn Business Owners...join us September 5th in San Antonio!

 [#LonghornCoffee](#) at Press Coffee at Castle Hills on 11103 West Aven...see more




TEXAS EXES
LONGHORN BUSINESS NETWORK


Reach more customers, connect with industry leaders, share best practices, and give your brand an edge.

Join today.
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Promoted



[Local TV Ad Settlements](#)
Affects those who paid a TV broadcaster directly for TV spot advertising



Invitation from LinkedIn
Place ads on LinkedIn. Acquire new customers for your business. Try it now.



Invitation from LinkedIn
Place ads on LinkedIn. Acquire new customers for your business. Try it now.

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LinkedIn LinkedIn Corporation © 2023

The screenshot displays the LinkedIn homepage interface. At the top, the navigation bar includes the LinkedIn logo, a search bar, and icons for Home, My Network, Jobs, Messaging, Notifications, Me, For Business, and Advertise. On the left sidebar, there are sections for 'Recent' (listing 'Texas Advertising & Public Rel...', 'Texas Exes', and 'Texas Exes - New York Chapter'), 'Groups' (with the same list), 'Events', 'Followed Hashtags', and a 'Discover more' button. The main content area features a large graphic of a heart with a penguin inside, and a post titled 'Download the Beginner's Guide' with 475 submissions. A sponsored advertisement for 'Class Action Lawsuits' is prominently displayed in the center, dated April 13. The ad includes a blue 'File A Claim' button and text stating: 'TV Spot Advertising Settlements Totaling \$48 Million', 'Class Action Lawsuits', and 'If you paid a TV broadcaster directly for television spot advertising, you may qualify for a payment'. To the right, a 'Messaging' sidebar is open, showing a search bar and a list of messages under the 'Focused' tab, including messages from Mothi Krishnaa, Diane Chiang, Patricia Sklar, Larry Brantley, and Kameron Block.

in Search

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See all

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Discover more

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475 submissions

25

Class Action Lawsuits

Sponsored Apr 13

TV Spot Advertising Settlements Totaling \$48 Million

File A Claim

Class Action Lawsuits

If you paid a TV broadcaster directly for television spot advertising, you may qualify for a payment


File A Claim →

Messaging

Search messages

Focused

- Class Action Lawsuits**
Sponsored TV Spot Advertising Settlement
- Mothi Krishnaa
InMail Requesting your participation in my MS...
- Diane Chiang
LinkedIn Offer Hi then Solimar! My name is Di...
- Patricia Sklar
InMail Award Winning NYC /Media Supervisor
- Larry Brantley
You: thank you!!
- Kameron Block



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Class Action Lawsuits

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Apr 13

TV Spot Advertising Settlements Totaling \$48 Million

File A Claim



Class Action Lawsuits

If you paid a TV broadcaster directly for television spot advertising, you may qualify for a payment

File A Claim →

LEGAL NOTICE



TV Spot Advertising Settlements Totaling \$48 Million

If you paid a TV broadcaster *directly* for television spot advertising, you may qualify for a payment

FILE A CLAIM

JND

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LinkedIn

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LEGAL NOTICE



TV Spot Advertising Settlements Totaling \$48 Million
If you paid a TV broadcaster *directly* for television spot advertising, you may qualify for a payment

FILE A CLAIM

JND

TODAY'S TOP NEWS

MEDIADAILYNEWS

Global Programmatic Click Fraud Averaged 17% In Q2

The desktop web had the highest rate, at 21%. ...

By Karlene Lukovitz

EVENTS & AWARDS

Each year MediaPost hosts more than 30 events across a range of disciplines... Which one is right for you?

UPCOMING EVENTS

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Talking TV: How News Content Authentication Is Battling AI



Pia Blumenthal, design manager for the AContent Authenticity Initiative at Adobe and co-chair of the UX Task Force at the Coalition for Content, Provenance and Authenticity, is on the front lines against news disinformation. She explains how the proliferation of generative AI is making that job a lot harder. *A full transcript of the conversation is included.*

By Michael Depp | August 18, 2023 | 5:30 a.m. ET.

The Coalition for Content, Provenance and Authenticity (C2PA) — a group comprised of technology and media companies — was formed to help combat disinformation by authenticating news content at its source. It was a tough job at the outset, but the emergence of generative AI is making it much harder as bad actors are equipped with ever-better tools.

Pia Blumenthal works with C2PA as co-chair of its UX Task Force, which she does alongside her day job also fighting disinformation as design manager for the Content Authenticity Initiative at Adobe. In this Talking TV conversation, she explains the work she's doing in each capacity.

It's work with which every newsroom needs to become acquainted as opportunities for their own news products to be manipulated proliferate. Content authentication will likely become an

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LEGAL NOTICE

TV Spot Advertising Settlements Totalling \$48 Million

If you paid a TV broadcaster directly for television spot advertising, you may qualify for a payment.

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SPONSORED CONTENT 

AI's Impact on the Future of Storytelling

The fusion of human creativity and technology



By Stacy Martinet, VP Marketing, Adobe

In a digital-first world where information overload is the norm, capturing and retaining attention has become an uphill battle for marketers and creators.

And amid constant change, AI has emerged as a powerful tool, reshaping the marketing landscape and transforming how stories are crafted and delivered. The fusion of AI and storytelling brings forth a new era of personalized, real-time and socially driven marketing, revolutionizing the way brands connect with their audiences.

2 key approaches

While the introduction of AI may seem to be an unprecedented change, marketers have been here before. Throughout history, technology has always disrupted the tools used to communicate. The invention of the printing press, the advent of the television, the development of the internet and the recent adoption of mobile have all revolutionized the dissemination of information and redefined how people communicate.

LEGAL NOTICE

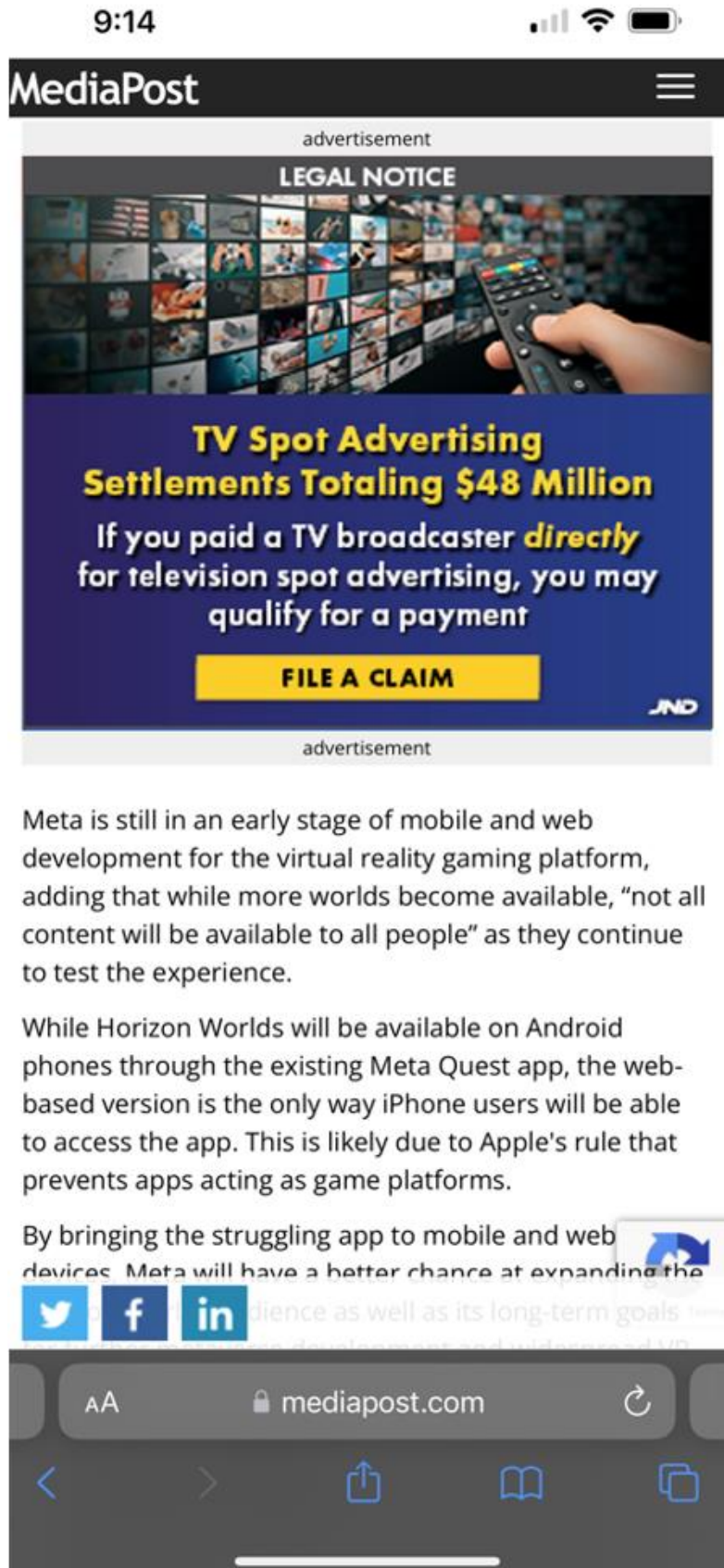


TV Spot Advertising Settlements Totalling \$48 Million

If you paid a TV broadcaster **directly** for television spot advertising, you may qualify for a payment

FILE A CLAIM

JNO

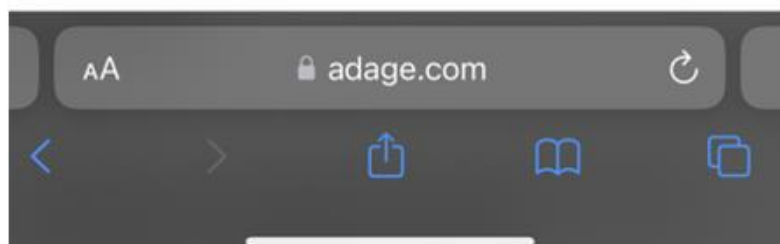


Meta is still in an early stage of mobile and web development for the virtual reality gaming platform, adding that while more worlds become available, “not all content will be available to all people” as they continue to test the experience.

While Horizon Worlds will be available on Android phones through the existing Meta Quest app, the web-based version is the only way iPhone users will be able to access the app. This is likely due to Apple's rule that prevents apps acting as game platforms.

By bringing the struggling app to mobile and web devices, Meta will have a better chance at expanding the

audience as well as its long-term goals



- EXHIBIT D -

LEGAL NOTICE

If you paid a TV broadcaster directly, you may qualify for a payment in TV Spot Advertising Settlements totaling \$48 million

YOUR RIGHTS AND OPTIONS

- ▶ **File a Claim by October 26, 2023**
- ▶ **Exclude yourself ("Opt Out") from one or more of the Settlements by October 26, 2023**
- ▶ **Object to any Settlement that you don't Opt Out of by October 26, 2023**
- ▶ **Attend the Hearing on December 7, 2023 at 12:30 p.m. CT**

LEARN MORE

www.TVAdsSettlement.com
1-844-717-0648



The Story of the Harlem Globetrotters' Return to TV

HOW PRESIDENT KEITH DAWKINS CREATES TOUCH POINTS FOR THE BRAND ALL YEAR. BY MOLLIE CAMILLANE



The Harlem Globetrotters hadn't had a television series since the 1970s—that is, until Keith Dawkins came along. The iconic basketball exhibition team—founded in Chicago in 1926—has long relied on its live tours to engage a passionate fan base with its legendary performances showcasing talents on traditional NBA rules. But to keep the century-old brand relevant, Dawkins, who joined the organization in early 2022 as president, set out to establish a new presence in a vastly changed media landscape.

"Content in all forms is really important for us because it allows us to have a 365-day-a-year conversation

with the audience and activate on that in whatever shape we choose," said Dawkins, who will be appearing at Brandweek this week to talk about the evolution of the brand.

TV was an obvious choice. After all, the CBS Saturday morning Harlem Globetrotters cartoon from the '70s became a cult hit. The animated Globetrotters even palled around with Scooby-Doo and the gang in multiple Hanna-Barbera-produced movies after the show's cancellation.

Though launching a successful TV series is easier said than done, Dawkins had substantial experience in the space.

In addition to running his own brand as founder and CEO of Brook Hill Media Ventures, the Globetrotters president previously spent nearly 18 years at Viacom, launching sports initiatives at Nickelodeon to cultivate strategic partnerships with leagues such as the NFL, NASCAR and the MLS.

So Dawkins spiked forward with bringing the Globetrotters back to the TV airwaves, introducing them to a new generation in what he told Adweek was a "strategic move for the organization."

"It was an opportunity to tell the story of the Globetrotters off the court in terms of the Goodwill Ambassador work, the social impact work," Dawkins said. And that move paid off.

Scoring with TV audiences

The TV deal closed "quickly," according to Dawkins, and the series went into production in summer 2022, debuting late last year.

In partnership with Hearst Media

Production Group, the 30-minute show, Harlem Globetrotters: Play It Forward, airs during NBC's The More You Know program block on Saturdays and appears on NBC's digital properties. It also brings in outside talent, with comedian Drew Robinson lending his hosting skills to the series.

To date, Harlem Globetrotters: Play It Forward reaches 900,000 viewers per week, with some episodes surpassing a million. "You can get a sense to launch, but the audience will decide if they like it or not," said Dawkins. "It's great in terms of its impact in social sales on the tour that we saw, but I would argue it's helped pivot the perception of the Globetrotters. The content conversations that have opened up, the sponsorship conversations that have opened up—its visibility and success has been a big part of that."

The series is currently in production for Season 2 (following a Daytime Emmy nomination), with Season 1 landing on Telemundo this fall.

INSIGHTS | SPORTS MARKETING

Just the beginning

Though the Globetrotters tour several months throughout the year, a priority for Dawkins has been creating touch points for audiences all year, engaging fans who can't make it inside the stadiums.

The team has new sports marketing ventures, including a backpack line with Spryground, as well as new apparel, gaming and NFT deals.

"It's an example of a consumer touch point, but also a brand extension where people perceive and think about the Globetrotters in a very modern way," Dawkins said.

But the majority of the brand's work is focused on its corporate social responsibility initiatives, highlighted in Play It Forward. This includes three pillars: health and wellness, education and community empowerment.

Playing it forward

Fans can see the team's humanitarian philosophy in action through its partnership with Red Nose Day, the annual fundraiser

to end children's poverty, and new initiatives with Microsoft housing an underserved Black and Brown communities around the globe.

"The Globetrotters were born out living in a world where being inclusive was not at the top of the list 100 years ago, and the Globetrotters still found a way to persevere through that," Dawkins said. "We need to honor our legacy of being an inclusive brand."

Dawkins is still focused on "solidifying" the tour in 2024, making it bigger than it was and expanding internationally.

"I want the Globetrotters to be relevant in ways that they haven't been in 30 or 40 years. I want to create pathways for anyone on planet Earth to have a touch point to the Globetrotters, and we can't do that if the tour is the only way," Dawkins said.



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- EXHIBIT E -

Purchasers of broadcast television spot advertising who paid the TV broadcaster(s) *directly* between January 1, 2014 and December 31, 2018 may qualify for a payment in multiple class action settlements totaling \$48 million

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- Four proposed settlements have been reached in a class action lawsuit called *In re: Local TV Advertising Antitrust Litigation*, MDL No. 2867, Case No. 18-C-06785 (N.D. Ill.) (the “Settlements”). The Settlements are between One Source Heating, Cooling, Inc., Thoughtworx, Inc., Hunt Adkins, Inc., and Fish Furniture, on behalf of the proposed Settlement Classes (together, “Plaintiffs”) and each of the following parties, respectively, Cox Media Group, LLC, Cox Enterprises, Inc., CMG Media Corporation (f/k/a Terrier Media Buyer, Inc. and d/b/a Cox Media Group), and Cox Reps, Inc. (collectively, “the Cox Entities”); Fox Corporation (“FOX”); CBS Corporation n/k/a Paramount Global (“CBS”); and ShareBuilders, Inc. (“ShareBuilders”) (collectively, “Settling Defendants”).
- These proposed Settlements are with these four Settling Defendants only and do not dismiss the claims against other defendants (“non-Settling Defendants”). The non-Settling Defendants, who deny all wrongdoing, remain in the case and Plaintiffs’ lawsuit will continue against them.
- Plaintiffs claim that they were injured as a result of defendants’ alleged participation in an unlawful conspiracy to fix, raise, maintain, or stabilize the price levels of broadcast television spot advertising and their alleged illegal sharing of information. Both the Settling Defendants and non-Settling Defendants deny these allegations and all alleged wrongdoing associated with Plaintiffs’ claims. The Court previously dismissed ShareBuilders from the lawsuit, but has not otherwise decided who is right or wrong. Instead, the settling parties have agreed to the Settlements to avoid the risk, cost, and inconvenience of further litigation.
- If the Settlements are approved by the Court, the Cox Entities will pay \$37,000,000, FOX will pay \$6,000,000, and CBS will pay \$5,000,000 (collectively \$48,000,000) for payments to Settlement Class Members who timely submit a valid claim, after deducting costs associated with Settlement administration and notice, taxes, class representative incentive awards, attorneys’ fees, and reimbursement for certain costs and expenses. In addition, the Settling Defendants will provide the Plaintiffs with valuable cooperation, which will be used to continue to prosecute this case against the non-Settling Defendants.
- You are a Settlement Class Member if you purchased broadcast television spot advertising *directly* from one or more Broadcaster Defendants in a designated market area (“DMA”) within which two or more of the Broadcaster Defendants sold broadcast television spot advertisements on broadcast television stations and you paid one or more Defendants *directly* for all or a portion of the cost of such broadcast television spot advertisements from January 1, 2014 to and including December 31, 2018 (the “Class Period”) (See Question 5).
- If you are a Settlement Class Member, your legal rights are affected whether or not you act. ***Please read this notice carefully.***

YOUR LEGAL RIGHTS AND OPTIONS		
FILE A CLAIM	<ul style="list-style-type: none"> • File a Claim Form for payment online or by mail • Be bound by the any or all Settlements as a member of the Settlement Classes • Give up your individual right to sue or continue to sue the Settling Defendant(s) for the claims in this case 	Submit online or postmarked by October 26, 2023
ASK TO BE EXCLUDED (“OPT OUT”)	<ul style="list-style-type: none"> • Remove yourself from any or all Settlement Classes and receive no payment from the respective Settlement(s) • Keep your individual right to sue or continue to sue the Settling Defendant(s) for the claims in this case 	Postmarked by October 26, 2023
OBJECT	<ul style="list-style-type: none"> • Tell the Court what you do not like about any or all of the Settlements — You will still be bound by the Settlements, and you may still file a claim 	Postmarked by October 26, 2023
ATTEND THE HEARING	<ul style="list-style-type: none"> • Ask to speak in Court about the Settlements — If you want your own attorney to represent you, you must pay for him or her yourself • File your Notice of Intent to Appear by October 26, 2023 	December 7, 2023
DO NOTHING	<ul style="list-style-type: none"> • Receive no payment • Give up your right to sue or continue to sue Settling Defendants for the claims in this case 	

- These rights and options—and the deadlines to exercise them—are explained in this notice. The deadlines may be moved, canceled, or otherwise modified, so please check the Settlement Website, www.TVAdsSettlement.com, regularly for updates and further details.
- You may Opt Out of one or more Settlements if you so choose.
- You may object to one or more Settlements if you so choose.
- The Court in charge of this case still has to decide whether to approve the Settlements. **Payments will be made after the Court approves the Settlements.** Please be patient.

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BASIC INFORMATION

1. Why is there a notice?

Defendants, including the Settling Defendants—The Cox Entities, CBS and FOX—sold broadcast television spot advertising in the United States. You may be affected if you purchased such advertising spots *directly* from one or more of the Broadcaster Defendants in the United States between January 1, 2014 and December 31, 2018 (the “Class Period”). You have a right to know about the proposed Settlements reached with Settling Defendants in this class action lawsuit, and about your rights and options, before the Court decides whether to approve the Settlements.

The Court in charge of this case is the United States District Court for the Northern District of Illinois, and the case is called *In re: Local TV Advertising Antitrust Litigation*, MDL No. 2867, Case No. 18-C-06785. The Settlements are between One Source Heating, Cooling, Inc., Thoughtworx, Inc., Hunt Adkins, Inc., and Fish Furniture, on behalf of the proposed Settlement Classes (together, “Plaintiffs”) and Cox Media Group, LLC, Cox Enterprises, Inc., CMG Media Corporation (f/k/a Terrier Media Buyer, Inc. and d/b/a Cox Media Group), and Cox Reps, Inc. (collectively, “The Cox Entities”), Fox Corporation (“FOX”), CBS Corporation k/n/a Paramount Global (“CBS”), and ShareBuilders, Inc. (“ShareBuilders”) (collectively, “Settling Defendants”).

The “Broadcaster Defendants” are CBS, Cox Media Group LLC, Dreamcatcher Broadcasting, LLC, FOX, Griffin Communications, LLC, Meredith Corporation, Nexstar Media Group, Inc., Raycom Media, Inc, The E.W. Scripps Company, Sinclair Broadcast Group, Inc., TEGNA, Inc., Tribune Broadcasting Company, LLC, and Tribune Media Company. ShareBuilders is not a Broadcaster Defendant, but rather Plaintiffs allege it aided the Broadcaster Defendants in effectuating their conspiracy.

2. What is this lawsuit about?

Plaintiffs claim that the Broadcaster Defendants engaged in a conspiracy to fix, raise, maintain, or stabilize the price levels of broadcast television spot advertising. Plaintiffs further claim that Cox Reps, Inc. and Katz Media Group, Inc.,¹ operating as “Sales Rep Firms,” as well as ShareBuilders, facilitated the exchange of communication between the Broadcaster Defendants. Plaintiffs further claim that they were injured as a result of an alleged conspiracy between the Sales Rep Firms, Broadcaster Defendants and ShareBuilders’ (collectively, “Defendants”) through the payment of artificially inflated prices.

Settling Defendants deny these allegations and all alleged wrongdoing associated with Plaintiffs’ claims. The Court previously dismissed ShareBuilders from the lawsuit, but has not otherwise decided who is right or wrong. Instead, the settling parties have agreed to these Settlements to avoid the risk, cost, and inconvenience of further litigation.

Plaintiffs’ case is still proceeding against other non-Settling Defendants, who deny all wrongdoing. Those non-Settling Defendants may be subject to separate settlements, judgments, or class certification orders, or may succeed in their defenses. If applicable, you

¹ Katz Media Group, Inc. petitioned for bankruptcy protection in March 2018, and a bankruptcy plan discharged any of Plaintiffs’ claims against it in May 2019.

will receive a separate notice regarding the progress of the litigation and any resolution of claims against the non-Settling Defendants.

3. Why is this a class action?

In a class action, one or more people called Class Representatives (in this case Plaintiffs One Source Heating, Cooling, Inc., Thoughtworx, Inc., Hunt Adkins, Inc., and Fish Furniture) sue on behalf of people and/or companies who have similar claims. All these people are a class or class members. Bringing a case, such as this one, as a class action allows resolution of many similar claims for persons and entities that might be economically too small to bring in individual actions. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why are there Settlements?

Settling Defendants deny that they did anything wrong. Plaintiffs and Settling Defendants have agreed to the Settlements to avoid the risk, cost, and inconvenience of further litigation. The Court has not decided in favor of Plaintiffs or Settling Defendants. Plaintiffs and their attorneys think the Settlements are in the best interests of the Settlement Classes and are fair, reasonable, and adequate. Settling Defendants have denied, and continue to deny, all allegations made by Plaintiffs.

WHO IS IN THE SETTLEMENT CLASSES?

5. Am I part of the Settlement Classes?

Each of the four Settlement Classes consist of the same members ("Settlement Class Members"): all persons and entities in the United States who purchased Broadcast Television Spot Advertising *directly* from one or more Broadcaster Defendants in a designated market area ("DMA") within which two or more of the Broadcaster Defendants sold broadcast television spot advertisements on broadcast television stations, including anyone who *directly* paid one or more Defendants for all or a portion of the cost of such broadcast television spot advertisements from January 1, 2014 to and including December 31, 2018 (the "Class Period").

Broadcast Television Spot Advertising means advertising spots that run on a broadcast television channel or channels that use public airwaves to transmit programs available to any television set within range of a broadcast transmitter, or that are retransmitted via multichannel video programming distributors ("MVPDs") such as cable, fiber optic networks (e.g., Verizon FiOS), satellite (e.g., DirecTV), and virtual MVPDs (e.g., Hulu + Live TV, fuboTV, YouTube TV). For the sake of clarity, Broadcast Television Spot Advertising includes advertising spots sold by and run on local broadcast stations that are usually affiliated with broadcast TV networks such as ABC, NBC, CBS, Fox, The CW, and MyTVNetwork. It does not include advertising spots that run on channels solely available through MVPDs or virtual MVPDs, such as ESPN, CNN, HGTV, Bravo, MSNBC, TBS, FX, or Fox News Channel.

The Broadcaster Defendants are CBS Corporation, Cox Media Group LLC, Dreamcatcher Broadcasting, LLC, FOX, Griffin Communications, LLC, Meredith Corporation, Nexstar Media Group, Inc., Raycom Media, Inc, The E.W. Scripps Company, Sinclair Broadcast Group, Inc., TEGNA, Inc., Tribune Broadcasting Company, LLC, and Tribune Media Company. Purchases made through Cox Reps (including Telerep and HRP) or Katz (including Continental,

Millennium, and Eagle) from any of the Broadcaster Defendants also qualify for inclusion in the Settlement Classes.

The DMAs within which two or more of the Broadcaster Defendants sold broadcast television spot advertisements on broadcast television stations are available at www.TVAdsSettlement.com or you may call 1-844-717-0648 to request a list.

Excluded from the Settlement Classes are Defendants, their parent companies, subsidiaries, affiliates, officers, directors, employees, assigns, successors, agents, or alleged co-conspirators; the court, court staff, defense counsel, all respective immediate family members of these excluded entities; federal governmental entities and instrumentalities of the federal government; and states and their subdivisions, agencies and instrumentalities.

6. What if I am still not sure if I am included in the Settlement Classes?

If you are not sure whether you are a Settlement Class Member, or have any other questions about the Settlements, visit www.TVAdsSettlement.com, or call toll-free at 1-844-717-0648.

SETTLEMENT BENEFITS – WHAT SETTLEMENT CLASS MEMBERS GET

7. What do the Settlements provide?

If the Settlements are approved by the Court, the Cox Entities will pay \$37,000,000, FOX will pay \$6,000,000, and CBS will pay \$5,000,000 (collectively \$48,000,000) for payments to Settlement Classes, along with cooperation to prosecute this case against the remaining non-Settling Defendants. In addition, ShareBuilders will provide the Plaintiffs with valuable cooperation. Settlement Class Members who timely submit a valid claim will receive payments, after deducting costs associated with Settlement administration and notice, taxes, class representative incentive awards, attorneys' fees (not to exceed 33.33% of the Settlements), and reimbursement for certain litigation costs and expenses (not to exceed \$6,000,000).

8. What can I get from the Settlements?

Settlement Class Members who file a valid and timely Claim Form will receive compensation on a *pro rata* basis, to the extent economically feasible. If the total final claim payment is equal to or less than \$5.00, no distribution will be made to that claimant, and the claimant will be notified that there will be no distribution given the de minimis value of the claim. If additional settlements are reached with non-Settling Defendants, more money may become available.

HOW TO GET A PAYMENT

9. How can I get a payment?

To be eligible to receive a payment from the Settlements, you must complete and submit a timely Claim Form. The Claim Form can be obtained online at www.TVAdsSettlement.com or by writing or emailing the Settlement Administrator at the address listed below. All Claim Forms must be submitted online or postmarked by **October 26, 2023**.

Local TV Advertising Settlement
c/o JND Legal Administration
PO Box 91068
Seattle WA 98111

QUESTIONS? Visit www.TVAdsSettlement.com or call toll-free at 1-844-717-0648

info@TVAdsSettlement.com
www.TVAdsSettlement.com

If you do not submit a valid Claim Form by **October 26, 2023**, you will not receive a payment, but you will be bound by the Court's judgment.

10. When will I get my payment?

Payments will be made to Settlement Class Members who submit a valid and timely Claim Form after the Court grants "final approval" to the Settlements. If the Court approves the Settlements, there may be appeals. It's always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient.

11. What am I giving up to receive a payment or stay in the Settlements?

If you are a Settlement Class Member, unless you exclude yourself from the Settlements, you cannot sue, continue to sue, or be part of any other lawsuit against Settling Defendants about the claims released in the Settlements. It also means that all the decisions by the Court will bind you. The Released Claims and Releasees are defined in the Settlement Agreements and describe the legal claims that you give up if you stay in the Settlements. The Settlement Agreements are available at www.TVAdsSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENTS

If you do not want a payment from the Settlements or you want to keep the right to sue or continue to sue Settling Defendants on your own about the claims released in these Settlements, then you must take steps to get out. This is called excluding yourself—or it is sometimes referred to as "opting out" of the Settlements.

12. How do I get out of the Settlements?

To exclude yourself (or "Opt Out") from any or all of the Settlements, you must submit an Exclusion Request. Your Exclusion Request must include the following:

- Your and the company's full name, current street address, telephone number; and email address;
- A statement saying that you want to be excluded from one or more of the Settlements and specifying which Settlement(s) you want to be excluded from (i.e., The Cox Entities, FOX, CBS, and/or ShareBuilders Settlement);
- The case name and number (*In re: Local TV Advertising Antitrust Litigation*, MDL No. 2867, Case No. 18-C-06785); and
- Your signature.

Your exclusion request must be postmarked by **October 26, 2023** to:

Local TV Advertising Settlement – Exclusions
c/o JND Legal Administration
PO Box 91068
Seattle, WA 98111

If you ask to be excluded from a Settlement, you will not get any payment from that Settlement, and you cannot object to that Settlement. You will not be legally bound by anything that happens in this lawsuit as related to any Settlement for which you opt out, and you may be able to sue (or continue to sue) individually the related Settling Defendant(s) about the claims in this lawsuit.

If you do not include the required information or timely submit your request for exclusion, you will remain a Settlement Class Member and will not be able to sue Settling Defendants about the claims in this lawsuit.

13. If I do not exclude myself, can I sue Settling Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Settling Defendants for the claims that these Settlements resolve. If you have a pending lawsuit against any of the Settling Defendants, speak to your lawyer in that lawsuit immediately. You must exclude yourself from the Settlements to continue your own lawsuit. If you properly exclude yourself from the Settlements, you will not be bound by any orders or judgments related to the Settlements.

14. If I exclude myself, can I still get a Settlement payment as part of this class action?

No. You will not get money from any Settlement for which you exclude yourself. If you exclude yourself from any Settlements, do not send in a Claim Form asking for benefits from that Settlement.

THE LAWYERS REPRESENTING YOU

15. Do I need to hire my own lawyer?

No. The Court has appointed Hausfeld LLP as Settlement Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Settlement Class Counsel will file a motion seeking a fee award (not to exceed 33.33% of the Settlements), reimbursement for certain litigation costs and expenses (not to exceed \$6,000,000), as well as reimbursement for expenses incurred for Settlement administration, including notice and taxes. Any attorney fee award is ultimately determined by the Court.

When Settlement Class Counsel's motion for fees, costs and expenses, and class representative incentive awards is filed, it will be available at www.TVAdsSettlement.com. The motion will be posted on the website at least **30** days before the deadline to opt out or object to the Settlements, and you will have an opportunity to comment on the motion.

OBJECTING TO THE SETTLEMENTS

17. How do I tell the Court if I do not like the Settlements?

Any Settlement Class Member who does not timely and properly Opt Out of a Settlement may object to the fairness, reasonableness, or adequacy of a proposed Settlement under Federal Rule of Civil Procedure 23. Objections can be submitted by U.S. mail, express mail, electronic

QUESTIONS? Visit www.TVAdsSettlement.com or call toll-free at 1-844-717-0648

transmission, or personal delivery, but to be timely, it must be postmarked to the Clerk of the Court, Settlement Class Counsel, and Counsel for Settling Defendants by **October 26, 2023**.

The written objection must include:

- The case name and number (*In re: Local TV Advertising Antitrust Litigation*, MDL No. 2867, Case No. 18-C-06785);
- Your (or the company's) name, address, and telephone number;
- Documents or testimony sufficient to establish your membership in the Settlement Class;
- A detailed statement of any objection asserted, including specifically which Settlement(s) you are objecting to (i.e., The Cox Entities, FOX, CBS, and/or ShareBuilders Settlement);
- Whether you are requesting the opportunity to appear and be heard at the Final Approval Hearing;
- The identity of all counsel (if any) representing you who will appear at the Final Approval Hearing and, if applicable, a list of all persons who will be called to testify in support of the objection;
- Copies of any papers, briefs, or other documents upon which your objection is based; and
- Your signature, in addition to the signature of your attorney (if any).

Your objection, along with any supporting material you wish to submit, must be delivered by **October 26, 2023** to the Clerk of the Court, Settlement Class Counsel, and Counsel for Settling Defendants at the addresses listed below:

Clerk of the Court	Counsel for Cox
Office of the Clerk United States District Court for the Northern District of Illinois 327 S Church Street Rockford, IL 61101	Jennifer L. Giordano Latham & Watkins LLP 555 Eleventh Street, NW, Suite 1000 Washington, DC 20004
Settlement Class Counsel	Counsel for FOX
Hausfeld LLP ATTN: In re Local TV Ads Litigation Settlement 888 16th Street NW, Suite 300 Washington, D.C. 20006	George S. Cary Kenneth S. Reinker Cleary Gottlieb Steen & Hamilton LLP 2112 Pennsylvania Avenue NW Washington, DC 20037
	Counsel for CBS
	Yehudah L. Buchweitz Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153

18. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlements. You can object to the Settlements only if you do not exclude yourself from the Settlements. Excluding yourself from the Settlements is telling the Court that you don't want to be part of the Settlements. If you exclude yourself from the Settlements, you have no basis to object to the Settlements because it no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the Settlements?

The Court will hold a Final Approval Hearing on December 7, 2023 at 12:30 p.m. CT.

At the hearing, the Court will consider whether to give final approval to the Settlements and grant Settlement Class Counsel's request for attorneys' fees (not to exceed 33.33% of the Settlement), reimbursement for certain litigation costs and expenses (not to exceed \$6,000,000), as well as reimbursement for expenses incurred for Settlement administration, including notice and taxes. We do not know how long these decisions will take.

20. Do I have to come to the hearing?

No. Settlement Class Counsel will answer any questions that the Court may have, but you may come at your own expense. If you submit an objection, you don't have to come to Court to talk about it. As long as you filed and served your written objection on time to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear." Your request must include your name (or the company's name), address, telephone number, and email, as well as the name, address, and telephone number of the person that will appear on your behalf, as well as copies of any papers, exhibits, or other evidence that you or your counsel will present to the Court in connection with the Final Approval Hearing. Your request must be filed with the Clerk of the Court and served upon Settlement Class Counsel and Counsel for Settling Defendants at the addresses listed in Question 17 on or before **October 26, 2023**.

If you do not provide a Notice of Intention to Appear in complete accordance with the deadline and specifications provided above, you may not be allowed to speak or otherwise present any views at the Final Approval Hearing.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you do nothing, you will not get a payment from the Settlements. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Settling Defendants about the legal issues in this case, ever again.

GETTING MORE INFORMATION

23. How do I get more information?

This notice summarizes the proposed Settlements. You can visit www.TVAdsSettlement.com to review the complete settlement documents, papers, and pleadings filed in this litigation, or contact the Settlement Administrator for more information:

Local TV Advertising Settlement
c/o JND Legal Administration
PO Box 91068
Seattle WA 98111

info@TVAdsSettlement.com
1-844-717-0648

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE

- EXHIBIT F -

Local TV Advertising Settlement Claim Form

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **OCTOBER 26, 2023**. THE CLAIM FORM MUST BE SIGNED AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

Payments will be made to Settlement Class Members who submit a valid and timely Claim Form after the Court grants “final approval” to the Settlements. If the Court approves the Settlements, there may be appeals. It’s always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient. We recommend saving purchase records between 1/1/2014 and 12/31/2018 in case the Settlement Administrator has questions regarding your claim. If you have any questions, please visit: www.TVAdsSettlement.com.

Instructions: Fill out each section of this form and sign where indicated. Mail your completed Claim Form to the Settlement Administrator at: Local TV Advertising Settlement, c/o JND Legal Administration, PO Box 91068, Seattle WA 98111.

Business Name		Authorized Business Representative Name															
Mailing Address																	
City	State	ZIP Code															
Email Address			Phone Number														
<p>The business identified above purchased Television Spot Advertisements from one or more Broadcaster Defendant in a DMA set forth in Appendix A of the Complaint between January 1, 2014 and December 31, 2018 (check all that apply; purchases made through Cox Reps (including Telerep and HRP) or Katz (including Continental, Millennium, and Eagle) from any of the entities below may be included):</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> CBS Corporation n/k/a Paramount Global</td> <td><input type="checkbox"/> Raycom Media, Inc</td> </tr> <tr> <td><input type="checkbox"/> Cox Media Group LLC</td> <td><input type="checkbox"/> The E.W. Scripps Company</td> </tr> <tr> <td><input type="checkbox"/> Dreamcatcher Broadcasting, LLC</td> <td><input type="checkbox"/> Sinclair Broadcast Group, Inc.</td> </tr> <tr> <td><input type="checkbox"/> Fox Corporation</td> <td><input type="checkbox"/> TEGNA, Inc.</td> </tr> <tr> <td><input type="checkbox"/> Griffin Communications, LLC</td> <td><input type="checkbox"/> Tribune Broadcasting Company, LLC</td> </tr> <tr> <td><input type="checkbox"/> Meredith Corporation</td> <td><input type="checkbox"/> Tribune Media Company</td> </tr> <tr> <td><input type="checkbox"/> Nexstar Media Group, Inc.</td> <td></td> </tr> </table>				<input type="checkbox"/> CBS Corporation n/k/a Paramount Global	<input type="checkbox"/> Raycom Media, Inc	<input type="checkbox"/> Cox Media Group LLC	<input type="checkbox"/> The E.W. Scripps Company	<input type="checkbox"/> Dreamcatcher Broadcasting, LLC	<input type="checkbox"/> Sinclair Broadcast Group, Inc.	<input type="checkbox"/> Fox Corporation	<input type="checkbox"/> TEGNA, Inc.	<input type="checkbox"/> Griffin Communications, LLC	<input type="checkbox"/> Tribune Broadcasting Company, LLC	<input type="checkbox"/> Meredith Corporation	<input type="checkbox"/> Tribune Media Company	<input type="checkbox"/> Nexstar Media Group, Inc.	
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<input type="checkbox"/> Griffin Communications, LLC	<input type="checkbox"/> Tribune Broadcasting Company, LLC																
<input type="checkbox"/> Meredith Corporation	<input type="checkbox"/> Tribune Media Company																
<input type="checkbox"/> Nexstar Media Group, Inc.																	

Settlement Class Member Affirmation: I affirm under the laws of the United States and the laws of my state of residence that the information supplied in this Claim Form by the undersigned is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

Signature of Authorized Business Representative

Date

Printed Name

Title

Questions? Visit www.TVAdsSettlement.com.

To view JND’s privacy policy, please visit <https://www.jndla.com/privacy-policy>

- EXHIBIT G -

From: info@TVAdsSettlement.com
To: [Class Member email address]
Subject: Local Television Settlements



Purchasers of broadcast television spot advertising who paid the TV Broadcaster(s) *directly* between January 1, 2014 and December 31, 2018 may qualify for a payment in multiple class action settlements totaling \$48 million

YOUR UNIQUE ID:	<<Unique_ID>>
PLEASE SAVE THIS NUMBER TO FILE A CLAIM	

You were previously sent a notice regarding filing a claim in the Local Television Settlements. You must submit a valid claim online at www.TVAdsSettlement.com or postmarked by mail no later than **October 26, 2023**. Claim Forms are available at www.TVAdsSettlement.com, or may be requested by calling 1-844-717-0648.

FILE A CLAIM

If the Settlements are approved by the Court, The Cox Entities will pay \$37,000,000, FOX will pay \$6,000,000, and CBS will pay \$5,000,000 (collectively \$48,000,000) for payments to Settlement Class Members who timely submit a valid claim, after deducting costs associated with Settlement administration and notice, taxes, attorneys' fees (not to exceed 33.33% of the Settlements), and reimbursement for certain litigation costs and expenses (not to exceed \$6,000,000). In addition, the Settling Defendants will provide the Plaintiffs with cooperation, which will be used to continue to prosecute this case against the remaining non-Settling Defendants. Settlement Class Members who timely submit a valid approved Claim Form will receive compensation on a *pro rata* basis, to the extent economically feasible. If the total final claim payment is equal to or less than \$5.00, no distribution will be made to that claimant, and the claimant will be notified that there will be no distribution given the de minimis value of the claim. Go to www.TVAdsSettlement.com to learn more.

Questions? Visit www.TVAdsSettlement.com or Call 1-844-717-0648

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

- EXHIBIT H -

REMINDER NOTICE

Purchasers of broadcast television spot advertising who paid the TV Broadcaster(s) directly between January 1, 2014 and December 31, 2018 may qualify for a payment in multiple class action settlements totaling \$48 million



TIME IS RUNNING OUT.
FILE YOUR CLAIM BY **OCTOBER 26, 2023.**

Questions?

Visit www.TVAdsSettlement.com or
Call 1-844-717-0648

Local TV Advertising Settlement
c/o JND Legal Administration
PO Box 91068
Seattle WA 98111

«MailingBarcode»

Postal Service: Please do not mark barcode

«Fullname»

«AddressLine1»

«AddressLine2»

«AddressCity», «AddressState»

«AddressPostalCode»

«AddressCountry»

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Questions? Visit www.TVAdsSettlement.com; call toll-free 1-844-717-0648; email info@TVAdsSettlement.com, or write Local TV Advertising Settlement, c/o JND Legal Administration, PO Box 91068, Seattle WA 98111.

YOUR UNIQUE ID:

<<NameNumber>>

PLEASE SAVE THIS NUMBER TO FILE A CLAIM

